

### REMARKS

The Office Action dated June 8, 2007 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

At this time, claims 4 through 8 are pending on the subject application, but claims 7 and 8 were previously withdrawn from consideration in an Election in response to a Restriction Requirement. The Office Action continues to reject independent claim 4 and its dependent claim 5 as being anticipated by several alleged prior art references, as described in greater detail below. The Office Action also continues to object to claim 6 as depending from a rejected claim but reiterates that this claim would be allowable if rewritten in independent format. The Office Action's prior art rejection of the pending claims is traversed in view of the following remarks. Reconsideration and allowance of the pending claims is respectfully requested.

*In Section 4 beginning at page 2, the Office Action continues to reject claim 4 under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent No. 4,082,180 of Chung (the "Chung" reference). Applicants have carefully reviewed Chung and conclude that it fails to teach every recitation of claim 4, as described below. Consequently, this prior art rejection of claim 4 in view of Chung is respectfully traversed.*

Claim 4, from which claims 5 and 6 are dependent, disclosed a motorized roller that includes a roller body of the motorized roller, a motor disposed inside the roller

body, a reducer which is disposed inside the roller body, and reduces the rotation of the motor, and a rotor which is disposed inside the roller body, and connected with the reducer and the roller body to transmit power of the reducer to the roller body. Furthermore, the roller body includes a first roller body and a second roller body, and an axial end section of a second roller body side of the first roller body and an axial end section of a first roller body side of the second roller body are connected at a power transmission section between the rotor and the roller body.

Specifically, the Action alleges the following:

Chung teaches a motorized roller comprising: a roller body 20, 30 of the motorized roller; a motor 46 disposed inside the roller body 20, 30; a reducer 40 which is disposed inside the roller body 20, 30, and reduces the rotation of the motor 46; and a rotor 112 which is disposed inside the roller body 20, 30, and connected with the reducer 40 and the roller body 20, 30 to transmit power of the reducer 40 to the roller body 20, 30; wherein the roller body 20, 30 comprises a first roller body 20 and a second roller body 30, and an axial end section of a second roller body side of the first roller body 20 and an axial end section of a first roller body side of the second roller body are connected at a power transmission section between the rotor and the roller body.

As an initial observation, the Office Action's incorrectly identifies that element 20 teaches the recited first roller body. Referring to FIG. 3 of Chung, element 20 is a conveyer belt and not part of the roller. Moreover, the conveyer belt 20 rides on and is therefore not "connected" to cylindrical rim 30 as recited in claim 4. Furthermore, as depicted in FIGS. 1 through 3, elements 20 and 30 in Chung are layered and do not meet at axial ends. For these reasons, Chung does not teach the limitation that "an axial end section of a second roller body side of the first roller body and an axial end section of a

first roller body side of the second roller body are connected.” For similar reasons, while it may be argued that rotational force originating from shaft 112 is eventually applied to an interior surface of the rim 30 (not admitted), the disclosed elements 20 and 30 are not connected at this “power transmission section” of the rotor as recited in claim 4.

Furthermore, Applicants submit that element 112 is not a “rotor” as recited in claim 4. In particular, the specification of Chung identifies element 112 as a shaft connected to the gear reducer 42. This shaft 112 is not located near or otherwise connected to supposed roller body 20, 30 as recited in claim 4.

For at least these reasons, Applicants urge that Chung does not anticipate claim 4, and that this rejection should be withdrawn. Claim 5 and 6 should be allowable as depending from allowable claim 4. Moreover, the Office Action does not apply Chung to claim 5. Thus, even if claim 4 remains rejected as anticipated by Chung, claim 5 should be separately allowable over Chung.

*Referring now to Section 5 of the Action beginning at page 3, the Action rejects claim 4 alternatively under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent No. 5,088,596 of Agnoff (the “Agnoff” reference). Applicants have carefully reviewed Agnoff and conclude that it fails to teach every recitation of claim 4, as described below. Consequently, this prior art rejection of claim 4 in view of Agnoff is respectfully traversed.*

Specifically, section 5 of the Action includes the following:

Agnoff teaches (Fig. 1) a motor 70, reducer 120, a rotor 82, wherein the roller body comprises a first roller body 16 and a second roller body 20 and an axial end section of a second roller body side of the first roller body 16 and an axial end section of a first roller body side of the second roller body 20 are connected (at 20c) at a power transmission section between the rotor and the roller body.

Contrary to the statements contained in the above-reproduced portion of Section 5 of the Office Action, Applicants note that the identified rotor 82 is a portion of the motor 70 and does not connect to either a gear reducer or a motor as recited in claim 4. Instead, as depicted in FIG. 1 of Agnoff, a motor 70 connects to a reducer 120 to provide rotational force to a drive member adapted to transfer this force to a roller tube 16.

Continuing with FIG. 1 of Agnoff, an end cap 20 is inserted into an end of the roller tube 16, entirely unconnected to the motor 70, except by the roller tube 16. Continuing with FIG. 1, the end cap 20 is inserted substantially within the roller tube 16. Consequently, elements 16 and 20, referenced in the Action, respectively, as the first and second roller bodies, are layered and do not meet at axial ends as recited in claim 4. Specifically, it appears that Agnoff does not teach the limitation that “an axial end section of a second roller body side of the first roller body and an axial end section of a first roller body side of the second roller body are connected.” Applicants further note that the end cap 20, identified in the action as the second roller body part, is positioned away from and does not contact either the rotor 82 or the clutch 170 that transfers the rotational

force. In this way, the roller tube 16 and the end cap 20 are not connected at “a power transmission section” as recited in claim 4.

For at least these reasons, Agnoff does not anticipate claim 4 and that this rejection should be withdrawn. Claim 5 and 6 should be allowable as depending from allowable claim 4. Moreover, the Office Action does not apply Agnoff to claim 5. As a consequence, even if claim 4 remains rejected in view of Agnoff, claim 5 should be separately allowable.

*Referring now to Section 6 of the Action beginning at page 5, the Action further rejects claims 4 and 5 under 35 U.S.C. §102(b) as being anticipated U.S. Patent No. 6,447,336 of Fannin et al. (the “Fannin” reference). Fannin also does not teach every recitation of claims 4 and 5. Consequently, this rejection of claims 4 and 5 is respectfully traversed in view of the remarks below describing the differences between the embodiment recited in claims 4 and 5 and the teachings of Fannin.*

Specifically, the Action alleges the following:

Fannin et al. teach a motor 82, reducer 84, a rotor 89, wherein the roller body comprises a first roller body 104 and a second roller body 88 and an axial end section of a second roller body side of the first roller body 104 and an axial end section of a first roller body side of the second roller body 88 are connected at a power transmission section between the rotor and the roller body.

As depicted in FIG. 4 of Fannin, an outer plate 104 is inserted substantially within an outer tube 88. Consequently, elements 88 and 104, referenced in the Action,

respectively, as the first and second roller bodies, do not meet at axial ends thereof as recited in claim 4. Specifically, it appears that Fannin also does not teach the limitation that “an axial end section of a second roller body side of the first roller body and an axial end section of a first roller body side of the second roller body are connected.” Instead, it appears that an outer radial surface of the outer plate 104 contacts an interior radial surface of the outer tube 88. Likewise, it appears that the outer ring 89 of Fannin applies radial force to an interior surface of the outer tube 88, and that the outer tube 88 and the outer plate 104 connect at a separate location. Therefore, Fannin does not appear to teach the recitation that first and second roller bodies connect at a power transmission section between the rotor and the roller body.

For at least these reasons, Fannin does not anticipate claim 4 and that this rejection should be withdrawn. Furthermore, claims 5 and 6 should be allowable on similar grounds as depending from allowable claim 4.

Moreover, Fannin also does not recite the limitations of claim 5, which is separately patentable over Fannin. In particular, claim 5 recites that the inner peripheral surfaces of the first roller body and the second roller body are connected to an outer peripheral surface of the rotor. As explained above, the Office Action identifies the outer tube 88 as the first roller body, the outer plate 104 as the second roller body, and the outer ring 89 as the rotor. Referring to FIG. 4 of Fannin, it can be seen that the outer tube 88 connects to an annular surface of the outer plate 89, and the outer plate 104 connects to a different axial surface of the outer plate 89. In this way, elements 88 and 104 do not

connect to an outer peripheral surface of element 89, which is identified in the Action as the rotor. Because Fannin does not provide every recitation of claim 5, this rejection is likely improper and should be withdrawn.

As discussed above, each of the pending claims recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicants submit that the recited subject matter is more than sufficient to render the recited embodiments of the present invention non-obvious to a person of ordinary skill in the technical art of telecommunications. It is respectfully requested that independent claim 4 and the related dependent claims be allowed in view of the above arguments, comments, and remarks.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a long, sweeping horizontal line that tapers off to the right.

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